

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**JANA K. LANDRY, individually, and as next
of kin and personnel representative of Matthew
Conrad Nelson (deceased),
*Plaintiff***

V.

**STEVEN SPERRY, et al
*Defendants***

CIVIL ACTION NO. H-17-0370

Judge Lee H. Rosenthal

COUNTY DEFENDANT'S INITIAL DISCLOSURES

Defendants Harris County, Dr. Michael Seale, Sharon Lambi and Rosemary Ojih (“County Defendants”) now file this their Initial Disclosures pursuant to FED. R. CIV. P. 26, as follows:

**(1) FED. R. CIV. P. 26 (a)(1)(A): Individuals Likely to Have Discoverable Information
that the Disclosing Party May Use to Support its Defenses:**

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The following individuals are believed to have been employees or contract agents of Harris County or Harris County Sheriff's Office during the relevant incarceration and are believed to have information regarding the Plaintiff and matters relating to the subject matter of this lawsuit. Unless otherwise indicated, the following individuals contact information is as follows: Harris County Attorney's Office, % F. Clinton Gambill, II, 1019 Congress, 15th Floor, Houston, TX 77002; telephone 713-274-5136.

Dr. Michael Seale

Sharon Lambi

Rosemary Ojih

Unless otherwise indicated, the following individuals contact information is as follows: Bruce R. Garcia, Office of the Attorney General, P.O. Box 12548, Capitol Station, Austin, Texas 78711-254; telephone 512-463-2080.

Steven Sperry

Bryan Collier

Unless otherwise indicated, the following individuals contact information is as follows: Paul Lamp, Rogers, Morris & Grover, LLP, 5718 Westheimer Rd., Suite 1200, Houston, TX 77057; telephone 713-960-6000.

Pilar Laborde-Lahoz

Sunil Athavale

Unless otherwise indicated, the following individuals contact information is as follows: Pascal Paul Piazza, Zukowski, Bresenhan & Piazza, LLP, 1177 West Loop South, Suite 1100, Houston, TX 77027; telephone 713-965-9969.

David Cunningham

Unless otherwise indicated, the following individuals contact information is as follows: Craig K. Ribbeck, The Ribbeck Law Firm, PLLC, 6363 Woodhead, Suite 300, Houston, TX 77057; telephone 713-621-5220.

Jed Silverman

(2) FED. R. CIV. P. 26 (a)(B): Description of Documents by Category that the Disclosing Party May Use to Support their Defenses:

1. Documents concerning the criminal history and incarceration of Matthew Conard Nelson.

(3) FED. R. CIV. P. 26 (a)(C):
Not applicable.

(4) FED. R. CIV. P. 26 (a)(D):
Not applicable.

Respectfully submitted,

OF COUNSEL

VINCE RYAN
HARRIS COUNTY ATTORNEY

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F. CLINTON GAMBILL, II
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ATTORNEY-IN-CHARGE FOR
COUNTY DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on this the 29th day of March, 2017, a true and correct copy of the foregoing pleading was delivered in accordance with the Federal Rules of Civil Procedure to the following:

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